

February 18, 2005



Deepak Joshi  
Lead Aerospace Engineer (Structures)  
National Transportation Safety Board  
Room 5235, 490 L'Enfant Plaza S.W.,  
Washington DC., 20594

Re: NPRM 427

Dear Sirs,

What would this proposed change in the accident/incident reporting requirements actually accomplish? Will those incidents be investigated if they are re-classified as accidents? This is needless information which will do little more than clog the system with useless information.

The aviation industry already suffers from lack of standardization of regulation interpretation between the FAA FSDO's throughout the nation. To leave discretionary authority with the various NTSB jurisdictions, as to whether or not such incidents are to be classified as accidents, invites an uneven classification, which will inevitably lead to a degradation of the quality of useful accident statistical data.

Current regulations already account for the appropriate classification of accidents/incidents.

I urge you not to enact this proposed change.

Thank you,

David J. Chevalier  
CEO  
Blue Hawaiian Helicopters



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Thank you,

A handwritten signature in black ink, appearing to read "David J. Chevalier", with a long horizontal flourish extending to the right.

David J. Chevalier  
CEO  
Blue Hawaiian Helicopters